

# ROCKWELL LIME COMPANY

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July 7, 2004

Sent via E-mail and U S. Postal Service

Mr Constantinos Loukeris, Environmental Engineer  
U S Environmental Protection Agency  
Region 5  
77 West Jackson Blvd , AE-17J  
Chicago, IL 60604-35990

RECEIVED  
JUL 12 2004  
AIR ENFORCEMENT BRANCH  
U.S. EPA, REGION 5

Dear Mr Loukeris

Rockwell Lime Company (RLC) and SGS North America Inc , Mineral Services Division (SGS) would like to request a change in the "Sampling and Analysis Protocol" Attachment 3) that was submitted to the Agency on June 11, 2004

Under the section labeled "Sampling" "Location "B"", the original proposal stated

*"Location "B" is positioned immediately after the solidfuel 150-ton bin and just before the Raymond Bowl Mill on the gravimetric weigh feeder on RLC's Solid Fuel and Natural Gas Firing System. At this location increments will be manually collected in accordance with ASTM D2234 (Standard Practice for collection of a Gross Sample of Coal). The increment collection is classified as II-A-I This classification is known as a stopped belt cut on a systematic basis where human discretion is used. Increments will be collected every twenty-four minutes during the eight-hour test period.*

RLC and SGS are proposing to change that section to read as follows

"Location "B" is positioned immediately after the solid fuel 150-ton bin and just before the Raymond Bowl Mill on the gravimetric weigh feeder on RLC's Solid Fuel and Natural Gas Firing System At this location increments will be manually collected in accordance with ASTM D2234 (Standard Practice for collection of a Gross Sample of Coal) The increment collection is classified as II-C-I. This classification is known as a partial stream cut on a systematic basis where human discretion is used Increments will be collected every twenty-four minutes during the eight-hour test period

We are requesting this change because the increment collection method II-A-I (stopped belt cut) creates an upset condition in the kiln. It takes about 2 to 2.5 minutes to retrieve the sample every twenty-four minutes, which equates to 9.3% drop in fuel to the kiln causing large fluctuations in temperature, oxygen and carbon monoxide reading at the

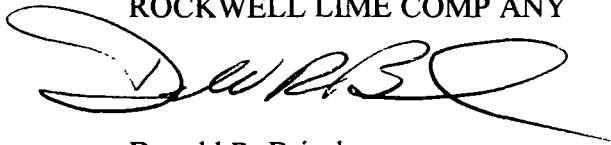
kiln exit. We discovered the problem while going thru a sample test run to be sure there would not be any problems during the official test

Please advise us at your earliest convenience if this request will be granted If you have any questions, please feel free to contact me at (920) 682- 7771

Thank you for your consideration.

Sincerely,

ROCKWELL LIME COMP ANY

A handwritten signature in black ink, appearing to read 'D. Brisch', with a large, sweeping flourish extending from the end.

Donald R. Brisch  
President

Cc Linda Bochert – Michael Best & Friedrich  
Terry Bolland – T.W Bolland & Associates